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December 17, 2014

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The Honorable Shira A. Scheindlin
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Laumann et al. v. National Hockey League et al.*,
12-cv-1817 (SAS); *Garber et al. v. Office of the Commissioner of*
Baseball et al., 12-cv-3704 (SAS)

Dear Judge Scheindlin:

We write on behalf of all the parties in both actions to address a scheduling issue. Plaintiffs were scheduled to depose Dr. Daniel L. McFadden, an expert offered by Defendants in support of their Daubert motion, on December 17, 2014. Due to an illness, Dr. McFadden was unable to testify on the scheduled date. In order to accommodate the witness and keeping in mind both the upcoming holidays and that the hearing on the class certification and Daubert motions is set for February 10-11, 2015, the parties have agreed on the following proposed adjustments to the schedule:

	<u>Current Date</u>	<u>New Date</u>
Dr. McFadden's deposition	12/17/14	12/19/14
Plaintiffs' class certification reply, Daubert Opposition, potential Daubert Motion	12/22/14	12/29/14
Defendants' Daubert Reply, potential Daubert Opposition	1/9/15	1/16/15
Plaintiffs' potential Daubert Reply	1/27/15	1/30/15

The parties respectfully request the Court's approval for these changes to the schedule.

Respectfully submitted,

Paul M. Eckles

cc: All counsel of record (by email)